

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAJAN CHAHAL, INDIVIDUALLY AND ON BEHALF OF
ALL OTHERS SIMILARLY SITUATED,

PLAINTIFF,

v.

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG,
CREDIT SUISSE INTERNATIONAL, TIDJANE THIAM,
DAVID R. MATHERS, JANUS HENDERSON GROUP
PLC, JANUS INDEX & CALCULATION SERVICES LLC,
AND JANUS DISTRIBUTORS LLC D/B/A JANUS
HENDERSON DISTRIBUTORS,

DEFENDANTS.

1:18-cv-02268 (AT) (SN)
1:18-cv-02319 (AT) (SN)
1:18-cv-04045 (AT) (SN)

GLENN EISENBERG, ON BEHALF OF HIMSELF AND
ALL OTHERS SIMILARLY SITUATED,

PLAINTIFF,

v.

CREDIT SUISSE AG AND JANUS INDEX &
CALCULATION SERVICES LLC,

DEFENDANTS.

SHAOLEI QIU, ON BEHALF OF HIMSELF AND ALL
OTHERS SIMILARLY SITUATED,

PLAINTIFF,

v.

CREDIT SUISSE GROUP AG AND JANUS INDEX &
CALCULATION SERVICES LLC,

DEFENDANTS.

**NOTICE OF MOTION BY THE CREDIT SUISSE DEFENDANTS TO DISMISS
THE CLASS ACTION COMPLAINT FOR FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that Defendants Credit Suisse Group AG and Credit Suisse
AG (“Credit Suisse”), Credit Suisse International (“CSI”), Tidjane Thiam (“Thiam”) and David

R. Mathers (“Mathers” and with Thiam, the “Individual Defendants”) (collectively the “Credit Suisse Defendants”), upon the Consolidated Class Action Complaint filed by Plaintiffs in the above-captioned proceeding, the accompanying Memorandum of Law in Support of the Credit Suisse Defendants’ Motion to Dismiss the Complaint for Failure to State a Claim, and the Declaration of Peter J. Linken, including all exhibits thereto, will move, by and through its undersigned counsel, before the Honorable Analisa Torres, United States District Court Judge for the Southern District of New York, on such date that the Court will determine, for an Order, pursuant to Federal Rules of Civil Procedure 8, 9(b) and 12(b)(6), dismissing with prejudice the Consolidated Class Action Complaint filed by Plaintiffs in the above-captioned proceeding.

Dated: November 2, 2018
New York, New York

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

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